

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

X-----X

SHANA MELIUS ,  
PLAINTIFF

20 Civ. 5237 (ER)  
Defendant's Response to  
Plaintiff's Demands to  
Produce

-against-

Council Member Andy King\*

X-----X

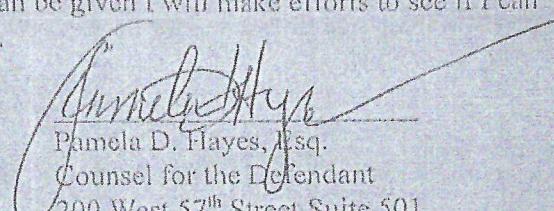
PLEASE TAKE NOTICE THAT PURSUANT TO F.R.C.P. AND LOCAL CIVIL RULES 26.3 AND 33.3 of the United States District Court for the Southern District of New York, defendant Andy King by and through his counsel makes the following answers to Plaintiff's Request to Produce.

1. Defendant King has no documents his possession regarding Plaintiff's personnel file. Defendant was not in possession of these files. Defendant was expelled from the City Council for the City of New York. He was expelled last year in 2020. Any documents that was in the possession of Mr. King was the property of the City Council and kept with the City Of New York City Council and would be in the possession of the City Counsel, their Office of the General Counsel, their Special Counsel, or the Attorneys who represented Mr. King, or their lawyers, ( who were required to sign a non-disclosure agreement). The Human Resources will have any or all these items. Last But Not Least Mr. King was represent by Lauren P. Raysor, Esq. as I did not represent Mr. King in that instance.
  
2. Defendant has none of the records demanded by Plaintiff in his possession. (See answer to response #1.)

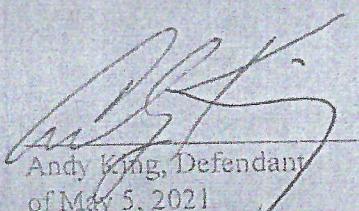
3. Defendant does not have any of Plaintiff's Demand to Produce Contained in Request #3.
4. Plaintiff does not have possession of any Documents demanded in paragraph #4, for the reasons stated in Response #1.
5. Plaintiff does not have any of these requests in his possession, for the above stated responded. Any request for a Reasonable Accommodation, would be handled by the City Council's HR Department.
6. Please see the attached exhibits which were included as exhibits and attached with Defendant King's Answer to his complaint. See exhibit A.
7. Objection: Plaintiff's request are overboard and may include privilege information he may have had with his previous counsel at the time or the City Council Committee on Standards and Ethics in Executive session. Defendant has no such information in his possession.
8. See answer to Requests #1 and #7.
9. Defendant King has no documents in his possession in Response to Request #9.
10. Said documentation is not in the possession of Plaintiff. Counsel would think that these documents are in the possession of the Special Counsel.
11. Objection: Plaintiff's Request #11 is an improper request for Document Production .
12. Plaintiff has no documents in his possession. The proper custodian of records would be the City Counsel Office of Human Resources, or the Special Council or General Council's Office, if said documents exist.
13. No Documents are in Plaintiff's possession, regarding said request.
14. Objection: Said request is overboard. Plaintiff has no knowledge of

any such documents. Moreover, if such documents existed, they would like be protected by medical privacy laws and would require a release from those individuals. If any such documents exists.

16. Objection: See the answer to Production of Documentation Request #6, Moreover Plaintiff testified in the Standards and Ethics Committee Inquiry, they would have a copy of the transcript, or the General Council's Office or the Special Counsel, Mr. King's previous Counsel. Counsel for Mr. King cannot turn over any transcripts without a release from their confidential agreement on disclosure of certain documents. Moreover this evidence would be in plaintiff's medical records which she has commented on during her testimony. In the event that this Court says that a transcripts can be given I will make efforts to see if I can help Counsel for the Plaintiff obtain it.

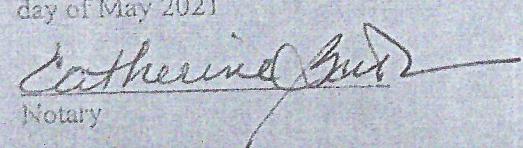


Pamela D. Hayes, Esq.  
Counsel for the Defendant  
200 West 57<sup>th</sup> Street Suite 501  
New York, New York 10019  
212 687-8724 cell (917) 216-6873  
Pambahayes7777@gmail.com



Andy King, Defendant  
of May 5, 2021

Sworn to me this 16  
day of May 2021



Notary

CATHERINE BATTLE  
Notary Public, State of New York  
Reg. No. 01BA6101419  
Qualified in Bronx County  
Commission Expires Nov 10 2023

\* Andy King is no longer a member of  
the New York City Council.